

STATE OF FLORIDA



STATE TECHNOLOGY OFFICE

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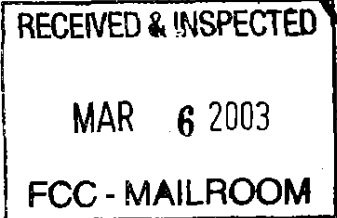


JEB BUSH
Governor

FRANK BROGAN
Lieutenant Governor

KIMBERLY BAHRAMI
Chief Information Officer

February 27, 2003



Honorable Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Vistronix, Inc.
236 Massachusetts Ave. N.E., Suite 110
Washington, DC 20002

FILED VIA E-MAIL 2/27/03

RE: Comments Responding to FCC 02-329, Report & Order & Second
Further Notice of Proposed Rulemaking Issued December 13, 2002, in
FCC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-
170

Dear Secretary Dortch:

As the Enterprise Information Solutions Officer over the state government
elecommunications network, I am writing on behalf of Florida's State
Technology Office to provide comments in response to FCC Order 02-329,
issued on December 13, 2002, in the dockets listed above.

Chapter 282, Florida Statutes, assigns the State Technology Office (STO) with
the responsibility for developing and maintaining the SUNCOM Network as
the state communications system. SUNCOM has existed under Florida law
since 1975. SUNCOM provides local and long distance telecommunications
service to a large customer base that includes state agencies, universities,
community colleges, libraries, local governments, school districts, and certain
non-profit corporations (including private universities and health care
providers).

The basis for filing STO comments is to seek clarification and support the
continuation of the current practice that allows local exchange companies to
charge Centrex customers for universal service contributions using a ratio of
one ninth of the rate charged to PBX trunks. This "Centrex equivalency ratio"
method established by the FCC is a fair and reasonable way to address the
difference in the two technologies in that a single PBX trunk supports multiple
lines behind the PBX. The potential for changing this previously approved
practice causes great concern for this office due to the financial impact to our
rate customers and the public funds supporting those customers.

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Honorable Marlene H. Dortch, Secretary

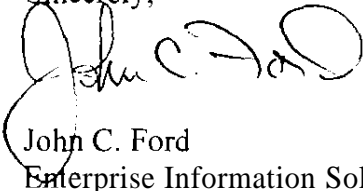
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Utilizing the services of three primary service providers (BellSouth, Sprint, and Verizon), the STO maintains over 200 Centrex systems with an estimated 200,000 lines statewide for the customer base described above in the second paragraph. In addition, there are certain agencies that individually procure Centrex systems from other service providers based on large volume requirements in remote locations (e.g., correctional facilities). If the effect of FCC Order 02-329 nullifies the existing ability of these local exchange companies to assess a one-ninth equivalency ratio for universal service charges on Centrex lines, the estimated financial impact on all these state Centrex systems will be **about one million dollars** (see attached spreadsheet for fiscal impact to the State Technology Office systems).

Representing the interests of our State customers, the State Technology Office strongly urges the FCC to uphold the current practice of the one-ninth ratio for Centrex stations (versus PBX trunks) for the collection of universal service contributions. In these times fraught with tremendous budget reductions, the discontinuation of the "Centrex equivalency ratio" practice would have a profoundly adverse effect on our state government Centrex users. **As** the estimated impact demonstrates, the State's Centrex users would be unfairly burdened doling out a disproportionate amount of dollars toward universal service contributions. For this reason, we encourage the Federal Communications Commission to provide clarification and support the current industry practice of utilizing the "Centrex equivalency ratio" method that was originally devised by the FCC to maintain a "level playing field" for Centrex **and** PBX services.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Ford", is written over a circular stamp or seal.

John C. Ford
Enterprise Information Solutions Officer

JCF:WEP:cm

**Attachment to State of Florida Comments Responding to FCC 02-329, Report & Order
& Second Further Notice of Proposed Rulemaking Issued December 13, 2002, in FCC
Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170**

Estimated Difference						
Vendor	Cost per line	Line Count	Cost per month	Estimated cost per year at current rate	ESTIMATED COST PER YEAR AT PROPOSED RATE	DIFFERENCE
BellSouth	\$0.06	85000	\$5,100.00	\$61,200.00	\$550,800.00	\$489,600.00
Verizon	\$0.07	35380	\$2,476.60	\$29,719.20	\$229,262.40	\$199,543.20
Sprint	60.50	80000	\$40,000.00	\$480,000.00	\$518,400.00	\$38,400.00
Totals		200380	\$47,576.60	\$570,919.20	\$1,298,462.40	\$727,543.20